

1 KENNETH R. O'BRIEN, Bar No. 072128  
E-mail: [kobrien@littler.com](mailto:kobrien@littler.com)  
2 LITTLER MENDELSON  
A Professional Corporation  
3 2520 Venture Oaks Way, Suite 390  
Sacramento, CA 95833.4227  
4 Telephone: 916.830.7200  
Facsimile: 916.561.0828

5 DENISE M. VISCONTI, Bar No. 214168  
E-mail: [dvisconti@littler.com](mailto:dvisconti@littler.com)  
6 LITTLER MENDELSON  
A Professional Corporation  
7 501 W. Broadway, Suite 900  
8 San Diego, CA 92101.3577  
Telephone: 619.232.0441  
9 Facsimile: 619.232.4302

10 Attorneys for Defendant  
AMERICAN AIRLINES, INC.

11  
12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA  
14 SAN FRANCISCO DIVISION

15 EDWARD E. ANDERSON,

16 Plaintiff,

17 v.

18 AMR The parent of AMERICAN  
AIRLINES INC, AMERICAN AIRLINES,  
19 and DOES 1 through 5 INCLUSIVE,

20 Defendants.

Case No. 07-cv-3527 WHA

**DECLARATION OF KATHERINE  
HARRIS IN SUPPORT OF DEFENDANT'S  
MOTION FOR SUMMARY JUDGMENT  
AND/OR SUMMARY ADJUDICATION OF  
CLAIMS AND OR JUDGMENT ON THE  
PLEADINGS**

Date: May 29, 2008  
Time: 8:00 a.m.  
Cttrn: 9  
Judge: William Alsup

21  
22  
23 I, KATHERINE HARRIS, hereby declare:

24 1. I currently am employed by American Airlines, Inc. (hereinafter "American") as  
25 Customer Services Manager Passenger Services at San Francisco International Airport in San  
26 Francisco, California ("SFO"), a position I have held since June 2000. I have personal knowledge of  
27 the information hereafter set forth. If called and sworn as a witness, I could and would competently  
28 testify thereto.

1           2.     From September 2007 through April 12, 2008, in my capacity as Customer Services  
2 Manager Passenger Services, I was in charge of the daily operations of American's curbside baggage  
3 handling operations, including the skycaps employed by American who work at SFO checking bags  
4 at the curbside. One of the employees I was in charge of during that time frame was Mr. Ed  
5 Anderson, who worked a part-time shift from 8:00 to noon, five days a week, with two days per  
6 week off. Mr. Anderson worked this exact same shift the entire time I served as his supervisor.

7           3.     Every skycap at SFO, including Mr. Anderson, has been assigned their own machine  
8 to create baggage tags for customers' luggage. While these machines occasionally go down and  
9 require service, they generally are repaired very quickly, often by me making a call to the software  
10 desk. Any time Mr. Anderson's machine went down while I served as his supervisor, I called the  
11 software desk as quickly as possible to ensure his machine gets fixed promptly. He was not assigned  
12 to any particular podium due to his race or his age and I never made or withheld service calls on the  
13 basis of his race or age in order to get his machine working again if it experiences problems. His  
14 machine was worked on by the same individuals who service podiums used by G2 skycaps when  
15 those machines had problems.

16           4.     While I was his supervisor, Mr. Anderson's bag tagging machine and podium was  
17 stationed at the western-most end of American's curbside, which is the second position where  
18 American skycaps or the skycaps it contracts with are stationed. Mr. Anderson worked at that  
19 position the entire time I served as his supervisor.

20           5.     I never scheduled Mr. Anderson to work particular hours, assigned him to work at a  
21 particular location, required him to use a particular podium or machine, or treated him differently  
22 than any other employee of American, based upon his race or his age or based upon any complaint  
23 he may have made to someone at American.

24     ///

25     ///

26     ///

27     ///

28     ///

1 I declare under penalty of perjury under the laws of the United States of America that the  
2 foregoing is true and correct.

3 Dated this 24 day of April, 2008 at San Francisco, California.

4  
5  
6   
7 Katherine Harris  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28